

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2001

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Docket No. R2001-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE TO  
THE OFFICE OF THE CONSUMER ADVOCATE'S INTERROGATORY  
(OCA/USPS-29))  
(October 17, 2001)**

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to interrogatory OCA/USPS-29, filed on October 4, 2001. The grounds for the objection are that the interrogatory requests information that is commercially sensitive and privileged.

Interrogatory 29 requests certain Express Mail revenue and volume information for specific Post Offices. The Postal Service has no objection to providing Express Mail revenue and volume data on a national basis. However, the Postal Service does object to providing Post Office specific data due to the commercial sensitivity of the requested information. The disclosure of Express Mail revenue and volume data for individual Post Offices would provide Postal Service competitors an unfair advantage in the expedited delivery market. Consequently, and consistent with Commission precedents,<sup>1</sup> the Postal Service does not intend to supply the requested information.

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<sup>1</sup> See POR No. R94-1/22 (June 3, 1994), where the Commission agreed with the Postal Service that the disaggregation of Express Mail delivery data posed a potential competitive harm and could conceivably be used by competitors to the Service's detriment.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

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Joseph K. Moore  
Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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Joseph K. Moore

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